515

1   IN THE UNITED STATES DISTRICT COURT
             FOR THE EASTERN DISTRICT OF VIRGINIA
2   RICHMOND DIVISION

3   _ _ _ _ _ _ _ _ _ _ _ _ _ _ _ _ _ _
                                            :
4   ePLUS, INC.,   :
                                            :
5   Plaintiff,   :
       v.   :   Civil Action
6   :   No. 3:09CV620
       LAWSON SOFTWARE, INC.,   :
7   :   January 6, 2011
                       Defendant.   :
8   _ _ _ _ _ _ _ _ _ _ _ _ _ _ _ _ _ _:

9

10

11   COMPLETE TRANSCRIPT OF **JURY TRIAL**
            BEFORE THE HONORABLE ROBERT E. PAYNE
12   UNITED STATES DISTRICT JUDGE, AND A JURY

13

14

15   APPEARANCES:

16   Scott L. Robertson, Esq.
       Jennifer A. Albert, Esq.
17   **Michael T. Strapp, Esq.**
       David M. Young, Esq.
18   GOODWIN PROCTOR
       901 New York Avenue, NW
19   Washington, D.C.   20001

20   Craig T. Merritt, Esq.
       CHRISTIAN & BARTON
21   909 E. Main Street, Suite 1200
       Richmond, VA   23219-3095
22
                 Counsel for the plaintiff ePlus
23

24
                    DIANE J. DAFFRON, RPR
25   OFFICIAL COURT REPORTER
                 UNITED STATES DISTRICT COURT

1   program and gives it a search query or initiates a

2   search using a characteristic of a drop down menu.

3   And the search engine then engages and returns items

4   that match the query.

5   Q   Did you examine a Lawson software program that

6   permits a user of a Lawson system to perform that

7   functionality?

8   A   Yes, the requisitioning system does that.

9   Q   You have building a requisition icon here. Do you

10   see that?

11   A   Yes.

12   Q   Please explain what you're intending to illustrate

13   there?

14   A   So in the Lawson system you build a shopping cart,

15   then you add and delete items from it until you're

16   satisfied with it. And then you do a checkout from

17   the Lawson system. And that engages the requisition

18   system and builds the requisition of all the items

19   that you want to order.

20   Q   Are you familiar with the term "a shopping cart"?

21   A   Yes.

22   Q   Is that consistent with your understanding of

23   building a requisition?

24   A   Well, it's not the requisition. It's the data

25   structure that can be modified. You can add and

1   delete to it. So in computer terminology, we call

2   this a cache, a C-A-C-H-E. So it's a data structure

3   that holds data, and then it's going to be transferred

4   to the requisition module, and it's in the requisition

5   module that the requisition is created.

6   Q   All right. Thank you for that correction. So is

7   it consistent with an order list?

8   A   The order list is the shopping cart and that's

9   what becomes the requisition.

10 Q   Did the Court define what an order list is in its

11 glossary of claim terms?

12 A   Yes. A list of desired catalog items.

13 Q   Did you apply that construction in doing your

14 infringement analysis?

15 A   Absolutely.

16 Q   Next you have an icon for generating purchase

17 orders. Do you see that as part of the overview of

18 the Lawson procurement system?

19 A   Yes.

20 Q   Can you explain that process here?

21 A   So we've got our requisition. This is our formal

22 list of the things we want to buy. It might have one

23 item. It might have a hundred items. The items might

24 be from one vendor or they might be from 100 vendors.

25 Whatever that requisition says, the purchase order

WEAVER - DIRECT   740

1

2   (The proceedings were adjourned at 5:15 p.m.)

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25